



WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

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COMES NOW Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through its attorneys, and respectfully requests a hearing regarding Plaintiffs’ Motion to Compel Re: Waived Privilege (Doc. 132). A proposed Order is enclosed for the Court’s consideration and convenience.

DATED this 15th day of September, 2022.

By: /s/ Jon A. Wilson  
Jon A. Wilson / Brett C. Jensen  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendant Watchtower  
Bible and Tract Society of New York,  
Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on September 15, 2022, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepans/Ryan R. Shaffer/James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
Missoula, MT 59802
3. Matthew L. Merrill (appearing *pro hac vice*)  
MERRILL LAW, LLC  
1863 Wazee Street, Suite 3A  
Denver, CO 80202
4. Gerry P. Fagan/Christopher T. Sweeney/Jordan W. FitzGerald  
MOULTON BELLINGHAM PC  
P.O. Box 2559  
Billings, MT 59103-2559
5. Bruce G. Mapley Sr.  
3905 Caylan Cove  
Birmingham, AL 35215

by the following means:

<u>1-4</u> CM/ECF	<u>          </u> Fax
<u>          </u> Hand Delivery	<u>          </u> E-Mail
<u>5</u> U.S. Mail	<u>          </u> Overnight Delivery Services

By: /s/ Jon A. Wilson  
Jon A. Wilson / Brett C. Jensen  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendant Watchtower  
Bible and Tract Society of New York,  
Inc.*